

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)

Streamlining Broadcast EEO)

Rules and Policies, Vacating the EEO)

Forfeiture Policy Statement)

And Amending Section 1.80 of)

The Commission's Rules to Include)

EEO Forfeiture Guidelines)

MM Docket No. 96-16

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REPLY COMMENTS OF NATIONAL RELIGIOUS BROADCASTERS

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October 25, 1996

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REPLY COMMENTS OF NATIONAL RELIGIOUS BROADCASTERS

National Religious Broadcasters ("NRB") hereby submits its reply to comments filed in the above-captioned proceeding.^{1/} NRB is a national association of radio and television broadcasters and programmers whose purpose is to "foster and encourage the broadcasting of religious programming."^{2/}

I. INTRODUCTION AND SUMMARY

The Commission in this proceeding seeks to "improve" and "clarify" its broadcast equal employment opportunity ("EEO") requirements by alleviating unnecessary regulatory burdens -- particularly those borne by "smaller stations and other distinctly situated

^{1/} *Order and Notice of Proposed Rulemaking*, MM Docket No. 96-16, FCC 96-49 (released February 16, 1996) ("*Notice*").

^{2/} National Religious Broadcasters, *Directory of Religious Broadcasting*, at 14 (1992-93).

broadcasters" -- while still maintaining sufficient safeguards to foster diversity among the ranks of broadcast station employees.^{3/} In proposing that the Commission reform its so-called "*King's Garden*" policy to comport with the analogous provisions of the nation's general employment statute, NRB seeks the same result.^{4/}

As noted below, the record now contains substantial support for reconsidering the scope of *King's Garden*, which currently affords religious broadcasters only a limited exemption from the Commission's religious nondiscrimination rule. NRB's proposal for a bright-line exemption extending to all positions at a religious station would appropriately accommodate the legitimate needs and desires of religious licensees, while in no way undermining the agency's essential EEO efforts.^{5/}

The few objections that have been raised against NRB's proposal lack merit. Two commentators have suggested that any expansion of *King's Garden* must be limited to the nonprofit activities of religious broadcasters.^{6/} One of these commentators also contends that any expansion of the *King's Garden* exemption would impair civil rights and diversity in the

^{3/} Notice at ¶ 1.

^{4/} See Comments of National Religious Broadcasters, MM Docket No. 96-16, at 11-13 (filed Apr. 30, 1996) ("NRB Comments") (proposing a bright-line rule exempting all positions at a religious station from the agency's prohibition on religious employment discrimination). NRB's proposal would thus expand upon the existing exemption set forth in *King's Garden, Inc.*, 34 F.C.C. 2d 937 (1972), *aff'd sub nom.*, *King's Garden v. F.C.C.*, 498 F.2d 51 (D.C. Cir.), *cert. denied*, 419 U.S. 996 (1974).

^{5/} See NRB Comments at 2.

^{6/} Comments of American Jewish Committee, MM Docket No. 96-16 (filed August 12, 1996) ("American Jewish Committee Comments"); Comments of Americans United for Separation of Church and State, et al., MM Docket No. 96-16 (filed August 12, 1996) ("Americans United Comments").

broadcast industry.^{7/} As NRB demonstrates below, the first assertion is not supported by the law, and the second assertion is not supported by the facts.

II. THE RECORD SUPPORTS REVISION OF THE COMMISSION'S EEO RULES TO PERMIT RELIGIOUS BROADCASTERS TO RECRUIT, HIRE, AND PROMOTE ALL EMPLOYEES ON THE BASIS OF RELIGIOUS BELIEF OR AFFILIATION

More than eighty commentators have joined NRB in urging the Commission to bring its EEO policies and rules back into step with Title VII of the Civil Rights Act ("CRA").^{8/} The record reveals that the limited exemption fashioned 24 years ago in the *King's Garden* case now lacks much of the legal foundation upon which it was premised.^{9/} Congress long ago revised Section 702 of the CRA to afford religious organizations discretion to utilize religious belief and/or affiliation as a bona fide occupational qualification ("BFOQ") for all employee positions -- and the Supreme Court has found this accommodation to be

^{7/} American Jewish Committee Comments at 6-7.

^{8/} See, e.g., Comments of Christian Legal Society's Center for Law and Religious Freedom, Concerned Women for America, and Focus on the Family, MM Docket No. 96-16, at 2 (filed July 11, 1996) ("CLS Comments"), Comments of the Center for Individual Rights, MM Docket No. 96-16, at 2-3 (filed July 1, 1996) ("CIR Comments"), Comments of Adventist Radio Network, MM Docket No. 96-16, at 5 (filed August 12, 1996) ("ARN Comments"). For a list of the entities who filed letters or other brief comments in support of the NRB proposal, see Attachment 1.

^{9/} See NRB Comments at 4-6 (noting that the Commission modeled its *King's Garden* policy on a Title VII provision applicable to religious entities that was later amended to more broadly accommodate the free exercise rights of religious organizations); ARN Comments at 2-3 ("the statutory basis for the FCC's reasoning in *King's Garden* has changed since that decision was issued"). Accord, CIR Comments at 3-4.

constitutionally sound.^{10/} More recently, through passage of the Religious Freedom Restoration Act ("RFRA"), Congress has explicitly mandated that government avoid measures that would "substantially burden" the exercise of First Amendment religious rights "even if the burden results from a rule of general applicability."^{11/}

In light of these developments, *King's Garden* is both anachronistic and needlessly restrictive. In contrast to the more generous exemption in the CRA, the Commission's existing policy limits the government's accommodation of religious broadcasters' legitimate interests by barring the use of religious beliefs or affiliation as a BFOQ unless the employee is "hired to espouse a particular religious philosophy over the air."^{12/}

NRB and other commentators have demonstrated that this policy places substantial and unnecessary burdens on religious broadcasters.^{13/} Chief among these burdens is the

^{10/} *Corporation of the Presiding Bishop of the Church of Jesus Christ of Latter-Day Saints v. Amos*, 483 U.S. 327, 344-45 (1987). See also NRB Comments at 4-5.

^{11/} See NRB Comments at 6 (noting that RFRA requires a government agency to show that a particular burden it has placed on the exercise of religion (1) furthers a compelling governmental interest, and (2) is the least restrictive means of furthering that compelling interest).

On October 16, 1996, the Supreme Court granted *certiorari* in the case of *City of Boerne v. Flores*, No. 96-2074, in which the petitioner challenges the constitutionality of RFRA. Regardless of the outcome of the *Flores* case, expansion of *King's Garden* is appropriate because it will create needed harmony between the agency's EEO policy and Section 702 of the CRA.

^{12/} *Id.*

^{13/} See NRB Comments at 10 (the *King's Garden* policy "deprive[s] religious broadcasters -- and only religious broadcasters -- of the ability to maintain a unified sense of organizational mission or purpose."); CLS Comments at 2-3 (noting that *King's Garden* denies broadcasters the "power of self-determination enjoyed by broadcasters who are
(continued...)

effective denial of the ability of religious licensees to order their internal affairs, including the need to ensure that all employees share a common commitment to the licensee's basic objective and mission.^{14/}

In addition, the record reveals that the current *King's Garden* policy needlessly entangles the Commission in religious affairs. Other commentators have echoed NRB's observation that, as it now operates, *King's Garden* presents the constitutionally unsavory picture of a government agency reviewing a religious entity's employment practices and then weighing how closely a particular set of job duties is linked to the espousal of the entity's religious messages.^{15/} In contrast, NRB's proposal for a bright-line exemption extending to all employees of a religious station would be both constitutionally permissible and simple to administer.^{16/}

^{13/}(...continued)

committed to non-religious ideological causes" and that there is significant "danger [in] permitting government to second-guess religious entities' understanding of their religious mission"); CIR Comments at 8 ("the protections of the Free Exercise Clause are not limited to positions in religious organizations that involve religious activities."); ARN Comments at 5 (cautioning against government involvement in determining which jobs are "religious" because a "behind-the-scenes individual whose job does not involve on-air appearances may be just as important to the promulgation of the organization's concept of its message as are the on-air stars").

^{14/} See NRB Comments at 9-10

^{15/} See NRB Comments at 12; CIR Comments at 10 (stating that the *King's Garden* rule requires the FCC to engage in the forbidden practice of "inquir[ing] into the good faith of the position asserted by the [religious broadcaster] and its relationship to the [broadcaster's] religious mission.") (citation omitted); CLS Comments at 10 (noting that "[i]t is difficult to imagine an area of the employment relationship less fit for scrutiny by secular courts than the claim that an employee's beliefs or practices make her unfit to advance [the organization's] mission.") (citation omitted).

^{16/} NRB Comments 11-13.

Furthermore, as NRB and other commentators have pointed out, the Commission would be hard-pressed to show that any compelling government interest would be served by retaining the *King's Garden* policy in its present form.^{17/} Because the FCC already exempts "espousal" employees from its general religious nondiscrimination rule, the *King's Garden* policy by definition can have no effect on programming content -- and yet this presumed effect remains the primary justification for the Commission's imposition of special broadcast-only EEO mandates.^{18/} Moreover, because *King's Garden* tends to foster a "two-track" career path at religious stations, it appears unlikely that the policy would create sufficient advancement opportunities for employees with differing religious views to indirectly serve any of the Commission's legitimate EEO goals.^{19/}

In sum, the record in this proceeding provides the Commission with ample justification for recasting the *King's Garden* exemption as a bright-line rule extending to all employees at a religious station. Such a modification would bring the Commission's EEO regulations into line with the views of Congress -- and circumvent the need to address the serious questions of statutory authority that are raised by the agency's current policy.

^{17/} See NRB Comments at 14-18; CIR Comments 4-10; CLS Comments 13-14.

^{18/} NRB Comments at 15-18.

^{19/} *Id.* at nn.25 & 38.

III. NOTHING IN THE RECORD REQUIRES LIMITING THE PROPOSED EXEMPTION TO THE NONPROFIT ACTIVITIES OF RELIGIOUS BROADCASTERS

The American Jewish Committee and Americans United contend that any revision of *King's Garden* must be limited to only the nonprofit activities of religious licensees.^{20/} They base this assertion on their reading of the *Amos* case, in which the Supreme Court upheld Congress' expansion of the analogous Title VII exemption accorded to religious organizations.

Such an interpretation of *Amos* is simply erroneous. The rationale set forth in Justice White's majority opinion makes no distinction between profit and nonprofit activities. Rather, the critical distinction at issue in *Amos* is the division between the "religious" and "nonreligious" activities of a religious entity, regardless of its corporate form. It is this troublesome distinction -- coupled with the specter of government line-drawing -- that drove the decision, not the religious entity's non-profit tax status.^{21/}

^{20/} The American Jewish Committee and Americans United apparently tacitly concede that *Amos* supports expansion of the *King's Garden* exemption to cover all employees of a nonprofit religious broadcaster. Many religious licensees are, in fact, organized as nonprofit entities. For example, the Adventist Radio Network, one of the commentors in this proceeding, is a nonprofit member organization consisting of seventeen stations. ARN Comments at 1.

^{21/} See, e.g., *Amos*, 483 U.S. at 335 ("It is a significant burden on a *religious organization* to require it, on pain of substantial liability, to predict which of its activities a secular court [or administrative body] will consider religious.") (emphasis added). As NRB noted in its initial comments, the *Amos* decision also makes clear that a bright-line exemption to the FCC's religious nondiscrimination rule for all of a religious broadcaster's employees would pass constitutional muster under *Lemon v. Kurtzman*, 403 U.S. 602 (1971), and its progeny. NRB Comments at n.29

A closer reading of *Amos* clarifies that the nonprofit status of the church activities there was relevant in only one respect: the Court held that such status justified recognition of a broad presumption that all nonprofit church endeavors fall within the scope of the Section 702 exemption.^{22/} Because "[n]onprofit activities . . . are *most likely* to present cases in which characterization of the activity as religious or secular will be a close question," the Court granted those nonprofit activities a "categorical exemption" from Title VII's general proscription on religious discrimination.^{23/}

However, this categorical exemption for a religious entity's nonprofit activities does not preclude a religious entity's commercial activities from also qualifying for treatment under the Section 702 exemption. The Court indicated that "[i]t is also conceivable that some for-profit activities could have a religious character, so that religious discrimination with respect to these activities would be justified."^{24/} Thus, the language of *Amos* provides ample room for application of the exemption to a broadcaster's for-profit activities so long as they are religious in nature.

^{22/} *Amos*, 483 U.S. at 344-45.

^{23/} *Amos*, 483 U.S. at 344-45 (emphasis added).

^{24/} *Amos*, 483 U.S. at 345 n.6 (1987). The Court also stated that "the exemption authorizing discrimination is *particularly* appropriate for [nonprofit] entities, because claims that they possess a religious dimension will be *especially* colorable." *Id.* (emphasis added). The implication is clear: while a non-profit entity's claim may be particularly strong, a for-profit entity's claim may also be "colorable."

IV. THE PROPOSED EXEMPTION WILL NOT UNDERMINE THE COMMISSION'S GENERAL EEO POLICIES

Americans United suggests that expanding the *King's Garden* exemption to all employees at a religious broadcast station would undermine government efforts to remedy problems of racial and ethnic discrimination in mass communications.^{25/} Although Americans United claims that NRB's proposal "could" lead to racial and ethnic discrimination and "could" have a negative impact on equal opportunity in the industry, it provides no support for these statements.^{26/}

Thus, Americans United has provided nothing but bare speculation as to what effect the proposed bright-line exemption might have on the Commission's efforts to prevent discrimination against minorities. But NRB's proposal is wholly unrelated to racial and ethnic discrimination. NRB has already explained that, under its proposal, religious licensees would remain fully subject to the FCC's ban on racial and gender discrimination. And as the

^{25/} See Americans United Comments at 6-7.

^{26/} Americans United Comments at 6. Americans United also argues that because all broadcasters are deemed "public trustees for the airwaves," they can be required to comply with a host of legal duties and obligations in "the public interest." *Id.* at 3-4. NRB agrees with this unremarkable assertion; its members abide by all FCC regulations, including prohibitions against racial and gender discrimination in employment.

Raising the concept of public trusteeship does not, however, provide answers to the relevant questions here: What "public interest" is being served by the current *King's Garden* policy, which already operates to sever the link between special broadcast EEO rules and programming content? How far can -- and should -- the Commission go in imposing on religious broadcasters a duty of religious nondiscrimination in employment that trenches on rights which both Congress and the Supreme Court recognize as valid? What statistical or other evidence does the Commission have to demonstrate that discrimination on religious grounds is a problem in the context of broadcast employment?

organization has already affirmed, "NRB does not advocate and would not support the use of the expanded exemption as a subterfuge for illicit discrimination against women and minorities."^{27/}

Other commentators that support NRB's proposal also have affirmed their commitment to the Commission's EEO requirements concerning race, ethnicity, and gender.^{28/} ARN made its point plain: "ARN believes it is immoral and bad business for a broadcast station to conduct racial or gender discrimination in its employment practices."^{29/} Similarly, CIR recognized that "religious broadcasters have a constitutional right to discriminate on the basis of religion, but not race or sex."^{30/}

The argument of Americans United contains more flaws than just its speculative basis. It is logically inconsistent to support the current *King's Garden* policy as "balance[d]" while nonetheless asserting that an extension of that same policy would lead to racial and ethnic discrimination.^{31/} If extending the policy would foster racial and ethnic discrimination, then *King's Garden* in its present iteration would presumably already have led to discrimination with respect to "espousal" employees -- and yet Americans United provides no evidence whatsoever on this matter, and indeed it makes no such assertion. The argument does, however, imply that it would be permissible to use a religious pretext to "discriminate"

^{27/} NRB Comments at 2.

^{28/} See, e.g., CLS Comments at 14.

^{29/} ARN Comments at 2.

^{30/} CIR Comments at 7.

^{31/} Americans United Comments at 4.

against minorities with respect to some of the most sought-after broadcasting jobs -- but that jobs that may command a lower profile, status, or pay still require government intervention to ensure that they remain accessible for minorities and women. This implication is, at best, ridiculous, and at worst, patronizing.

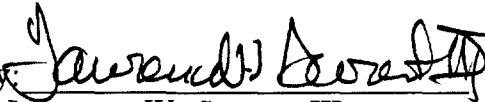
There is no evidence that the current *King's Garden* policy has fostered an increase in racial or ethnic discrimination, nor is the policy an impediment to the employment of women in broadcasting. Consequently, expanding the exemption to all religious broadcast station employees will not adversely affect the Commission's primary EEO concerns.

V. CONCLUSION

Nothing in the record refutes NRB's showing that the current *King's Garden* policy burdens the rights of religious broadcasters to self-determination and is not necessary to advance the Commission's core concern for fostering greater employment of minorities and women in broadcasting. Rather, the record provides ample support for recasting the policy as a bright-line rule that would allow religious broadcasters to consider religious belief or affiliation in hiring or promoting any employee at their stations.

Respectfully submitted,

NATIONAL RELIGIOUS BROADCASTERS

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October 25, 1996

ATTACHMENT I

As of October 22, 1996, the following parties filed letters in MM Docket 96-16 in support of NRB's Comments filed on April 30, 1996, in the same docket:

1. *Ambassador Advertising Agency*
515 E. Commonwealth Avenue
Fullerton, CA 92632
2. *Ankerberg Theological Research Institute*
John Ankerberg Show
P.O. Box 8977
Chattanooga, TN 37414-0977
3. *Bethelite Community Church*
36 West 123rd Street
New York, New York 10027
4. *Black Buffalo Trails*
North American Indian Missions, Inc.
P.O. Box 2607
Hemet, California 92546
5. *Carolina Christian Communications, Inc.*
P.O. Box 15400
Durham, NC 27704
6. *Cedar Ridge Children's Home and School, Inc.*
P.O. Box 439
Williamsport, MD
7. *Cedarville College*
P.O. Box 601
Cedarville, OH 45314
8. *Central Assembly of God*
1301 North Boonville
Springfield, MO 65802

9. *CGN Corporation*
P.O. Box 101
Milbank, SD 57252
10. *Christa Ministries*
19303 Fremont Avenue North
P.O. Box 330303
Seattle, Washington 98133-9703
11. *Christian Children's Associates, Inc.*
P.O.Box 446
Toms River, N.J. 08754
12. *Christian Family Network Television*
P.O. Box 442
Wichita Falls, Texas 76307
13. *Christian Men's Network*
[address unavailable]
14. *Christian Music Radio*
P.O. Box 248
Cumming, GA 30128
15. *Christian Talk Radio KHEP*
100 West Clarendon Avenue Suite 720
Phoenix, Arizona 85013-3528
16. *Christian Television Network*
15565 Northland Drive Suite 900 West
Southfield, Michigan 48075
17. *Cornerstone Community Radio, Inc.*
15 Walnut Hills
Springfield, IL 62707
18. *Derek Prince Ministries-International*
P.O. Box 19501
Charlotte, North Carolina 28219-9501
19. *Encounter Ministries, Inc.*
P.O.Box 757800
Memphis, TN 38175-7800

20. *Far East Broadcasting Company*
15700 Imperial Highway, Box 1
La Mirada, California 90637
21. *First Assembly of God*
2000 West McIntosh Road
Griffith, Georgia 30223
22. *The First Baptist Church
in the City of New York*
265 West 79 Street
New York, N.Y. 10024
23. *Forus Communications*
9620 Executive Center Drive Suite 105
St. Petersburg, FL 33702
24. *Friends of Christian Radio, Inc.*
P.O.Box 1169
Glendive, Montana 59330
25. *Gibbs & Craze, P.A.*
7705 Engle Road, Suite 502
Cleveland, Ohio 44130
26. *GoForth Media, Inc.*
P.O. Box 1328
Mobile, AL 36633-1328
27. *GoodNews Outreach*
1623 Senator Lane
London, KY 40741
28. *The Good Tidings Hour*
P.O. Box 588
New York, N.Y. 10008
29. *Gospel Music Association*
1205 Division Street
Nashville, TN 37203

30. *Gulf Meadows Church*
P.O. Box 750099
Houston, Texas 77275
31. *Haven Ministries*
2410 Hyperion Avenue
Los Angeles, CA 90027
32. *Hermano Pablo Ministries*
P.O. Box 100
Costa Mesa, CA 92628-0100
33. *Insight For Living*
P.O. Box 69000
Anaheim, CA 92817-0900
34. *Inspiration of Texas, KDFX-AM*
3500 Maple Avenue LB 46 Suite 1470
Dallas, TX 75219
(3 letters - T. Chatman, G. Anderson, M. Crockett)
35. *Jay Strack Evangelistic Association*
7380 Sand Lake Road, Suite 125
Orlando, Florida 32819
36. *Juventud Evangelica Inc.*
P.O. Box 08444
Fort Myers, FL 33908
37. *KCNW*
4535 Metropolitan Avenue
Kansas City, Kansas 66106
38. *KFAX-AM*
39138 Fremont Boulevard, 3rd Floor
Fremont, CA 94538
39. *KGLE Radio*
P.O. Box 931
Glendive, MT 59330

40. *KMC Media Incorporated*
12001 North Central Expressway
Suite 700
Dallas, TX 75243-3734
41. *KNGN Radio*
R.R. 3
Box 44A
McCook, NE 69001-9510
42. *KTEK (AM)*
24 E. Greenway Plaza, Suite 633
Houston, TX 77046
43. *KTIG-FM*
P.O. Box 409
Pequot Lakes, MN 56472
44. *KUGT Radio*
P.O. Box 546
Jackson, MO 63755
(2 letters - L. Dunger and K. Williams)
45. *Landin Media Sales Inc.*
3033 North 44th Street
Suite 375
Phoenix, Arizona 85018
46. *Life for Children*
P.O. Box 982000
Fort Worth, TX USA 76182
47. *Life Outreach International*
P.O. Box 982000
Fort Worth, TX 76182-8000
48. *Luis Palau Evangelistic Association*
P.O. Box 1173
Portland, Oregon 97207-1173
49. *Lutheran Ministries Media, Inc.*
3425 Crescent Avenue
Fort Wayne, Indiana 46805

50. *Mark Barclay Ministries*
P.O. Box 588
Midland, MI 48640-0588
51. *Mars Hill Broadcasting Co., Inc.*
4044 Makyes Road
Syracuse, NY 13215
52. *Maumee Valley Broadcasting Association, Inc.*
P.O. Box 457
7112 Angola Road
Holland, OH 43528
53. *Middle East Gospel Outreach*
P.O. Box 9562
Ontario, California 91762
54. *Minority Media and Telecommunications Council*
3636 16th Street, N.W.
Suite AG-58
Washington, D.C. 20010
55. *Moody Bible Institute*
820 N. LaSalle Boulevard
Chicago, Illinois 60610-3284
56. *Multimedia Ministries International*
18221 Torrence Avenue
Lansing, IL 60438
57. *Musical Memories*
P.O. Box 907
Oak Park, IL 60303
58. *Narramore Christian Foundation*
1409 N. Walnut Grove
P.O. Box 5000
Rosemead, CA 91770-0950
59. *Northwestern College Radio*
3003 Snelling Avenue North
St. Paul, Minnesota 55113-1599

60. *Open Door Church*
Six Hundred Miller Street
Chambersburg, PA 17201-1099
61. *Pentecostal Holiness Church*
P.O. Box 12609
Oklahoma, OK 73157
62. *Radio Training Network, Inc.*
P.O. Box 7217
Lakeland, FL 33807-7217
63. *Ranch Hope Inc.*
45 Sawmill Road
P.O. Box 325
Alloway, NJ 08001
64. *Resource Development, Inc.*
1411 E. Primrose, Suite A
Springfield, MO 65804
65. *Rocky Mountain Television*
12014 West 64th Avenue
Arvada, CO 80004
66. *Romanian Missionary Society*
1415 Hill Avenue
P.O. Box 527
Wheaton, IL 60189
67. *Salem Media of Colorado (KPKS-AM/KNUS-AM)*
7880 East Berry Place
Englewood, CO
68. *Salem Media of Oregon, Inc. (KPDQ-AM)*
5110 Southeast Stark Street
Portland, Oregon 97215-1790
69. *Scripture Union*
P.O. Box 6720
Wayne, PA

70. *Seven Locks Broadcasting/WCTN Radio*
7825 Tuckerman Lane
Suite 211
Potomac, MD 20854
71. *Son Broadcasting Co., Inc.*
P.O. Box 4338
Albuquerque, NM 87196
72. *Sterling Communications Corporation*
Bridgewater Place
333 Bridge Street, NW Suite 525
Grand Rapids, MI 49504-5356
73. *Tabernacle Presbyterian Church*
418 East 34th Street
Indianapolis, Indiana 46205
74. *Trans World Radio*
300 Gregson Drive
P.O. Box 8700
Cary, NC 27512-8700
75. *Truth Broadcasting Company*
P.O. Box 211
Locust, N.C. 28097
76. *WABS Radio*
5545 Lee Highway
Arlington, VA 22207
77. *WEFC-TV 38, Roanoke*
612 Bullitt Avenue SE
Roanoke, VA 24013-1798
78. *WTHL-TV*
2510 Parkway Court
Decatur, IL 62526
79. *WGGS TV 16, Greenville, SC*
P.O. Box 1616
Greenville, S.C. 29602

80. *WHCF-FM*
P.O. Box 5000
1476 Broadway
Bangor, ME 04402-5000
81. *WIBG-AM*
Cross Road Broadcasting
3328 Simpson Avenue
Ocean City, NJ 08226
82. *WKZI*
P.O. Box 8
Casey, Illinois 62420
83. *WNLR Radio*
P.O. Box 400
Churchville, VA 24421
84. *World Radio Missionary Fellowship, Inc.*
P.O. Box 39800
Colorado Springs, CO 80949-9800
85. *WRVM*
P.O. Box 212
Suring, WI 54174-0212